



**Municipality of Metropolitan Seattle**

Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

June 12, 1984

Ms. Judi Schwarz  
M/S 525  
U. S. Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, Washington 98101

Dear Ms. Schwarz:

Metro has reviewed the "Focused Feasibility Study for Surface Cleanup" of the Western Processing site (dated June 4, 1984). Metro's comments on the report in question pertain to the proposed discharge to Metro (pages 5-27 through 5-31). Your document lists pollutant discharge limitations in Table 5-4 which were in a draft permit for Western Processing in September, 1982. That draft permit was written specifically for the type of processing and operations Garnt Niewenhuis was then proposing to do on his site. In a similar manner, the permit drafted for the cleanup of the contaminated stormwater on the Western Processing site will be written specifically for that type of operation.

In drafting the new permit for the Western Processing site, some pollutant limitations included in the permit will be different from those shown in Table 5-4. Recently Metro lowered its general limitation for cadmium from a daily maximum of 3 mg/l to 1.2 mg/l. In the proposed permit for Mr. Niewenhuis' operation also contained a Total Halogenated Hydrocarbons (TOX) standard because of his intent to recycle solvents on the site. Since that operation is no longer being undertaken on the site, I don't feel that it's necessary to include a TOX standard. In its place, the new draft permit will instead contain a Total Toxic Organics (TTO) standard similar to the standard in the EPA's Electroplating/Metal Finishing Regulations. This TTO standard covers cleaning solvents such as Trichloroethylene and Trichloroethane which I understand have been found in the ponded water on the site.

My purpose in writing to you is to let you know that the waste discharge permit drafted for the surface cleanup operation at the Western Processing site will be drafted to fit that unique operation. While there are similarities in all of Metro's permits, each permit is drafted to protect our sewerage system and the environment with the type of activities at each site in mind. Metro appreciates the opportunity to participate in this review process. Attached you will find a copy of a letter I recently mailed to Mr. Goodman at the Washington State Department of Ecology. I want to emphasize

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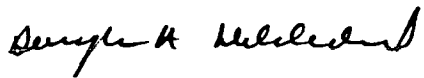
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June 12, 1984  
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that it is our intent to cooperate in any manner possible to expedite the cleanup process at the Western Processing site.

Very truly yours,



Douglas A. Hilderbrand  
Industrial Waste Supervisor  
Water Quality Division

DAH:mc  
Enclosure

cc: Ms. Isabel Hogan, Mayor of Kent  
Mr. John Spencer, Metro  
Mr. Bob McCormick, DOE



Municipality of Metropolitan Seattle

Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

June 11, 1984

Mr. Bob Goodman  
Washington State Department of Ecology  
M/S PV-11  
Olympia, Washington 98505

Dear Mr. Goodman:

Ms. Sarah Hubbard of CH<sub>2</sub>M-Hill in Bellevue contacted me on June 8, 1984, and notified me that ponded water on the Western Processing site will be treated on site and discharged to the Metro Sewer. Ms. Hubbard indicated that initially the operational control of the pretreatment system will be through the Environmental Protection Agency (EPA). Accordingly, CH<sub>2</sub>M-Hill is filling out an application for a Metro Waste discharge permit to be issued under the name of the EPA.

When Ms. Hubbard contacted me, I mentioned that Metro will do whatever we can to expedite processing the permit application. I think that proper pretreatment of the ponded water, with discharge to the Metro system is the best way to protect the environment. I also mentioned the statutory requirements I discussed with you in our May 11, 1984, telephone conversation, i.e., under RCW 90.48.240, an application shall be made at least sixty days prior to any proposed discharge. Since Metro is the Department of Ecology's authorized agent for administration of the permits we intend to abide by the statutory requirements, however, we will do what we can to expedite drafting of the permit and the associated processing requirements.

If we can be of assistance, please let me know. I can be contacted at 447-6743.

Very truly yours,

Douglas A. Hilderbrand  
Industrial Waste Supervisor  
Water Quality Division

DAH:mc

cc: Mr. John Spencer, Metro  
Mr. Bob McCormick, DOE

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